

# Supplier Code of Conduct

Port International GmbH

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## I. Scope

Port International is committed to a socially and ecologically sustainable corporate management. We expect all our employees to observe our corporate principles (Code of Conduct) on ecologically, socially, and ethically fair action. The same is expected from our business partners and suppliers. As part of a sustainable cooperation, we would like to ask you to comply with the following principles and requirements of the Supplier Code of Conduct and to pass them on to your subcontractors as well. All subcontractors are contractually bound to comply with the standards and regulations listed in this document. A violation of the specifications can lead to the termination of the business relationship, including all delivery agreements.

The code of conduct for suppliers is based on the following legal principles and guidelines:

- [German Supply Chain Due Diligence Act](#)
- [OECD Guide to Responsible Agricultural Supply Chains](#)
- [UN Guiding Principles on business and human rights](#)
- [EIT base code](#)
- [ILO Principles of Work](#)
- [ILO General principles and operational guidelines for fair recruitment](#)

## II. How to apply the Code of Conduct correctly

### **Risk management**

All suppliers (possibly with the exception of farmers) are obliged to determine, assess, reduce, and prevent the actual and potential human rights and environmental risks emanating from their business activities. The human rights and environmental risks identified as part of this risk analysis should be prioritized according to their nature and extent, and preventive or remedial measures should be defined. When setting up the risk management system, employees of the company and the people who may be affected by the economic activities of the company should be taken into account. The employees should be informed on a risk-based basis about the implementation of such a risk analysis, the corresponding measures communicated and, if necessary, training of the employees should be carried out. The analysis should be carried out at least once a year or more often if events occur.

### **Complaint management system**

The supplier is obliged to introduce a grievance system in its company that is accessible, transparent, reliable, and fair, while keeping the identity of the reporting person confidential and thereby offering protection against discrimination. Complaints can be put forward anonymously, if desired, and are treated with the utmost confidentiality. Such grievance mechanisms can provide remedy when the operations, business activities and/or behavior of others have resulted in or contributed to adverse impacts and/or violations of our core principles set out in this Code of Conduct.

The grievance system must have a working mechanism in place for all staff, individuals and communities who may be affected by adverse impacts.

Port International's grievance mechanism can be found on the website under the heading '[Feedback](#)' and is available in German and English. Alternatively, the grievance committee can also be contacted

by telephone, email, or post. Anonymous grievances will be fully accepted and treated in the strictest confidence. Complainants are protected from termination, retaliation, or threats for having used the complaints mechanism.

## 1. No forced labor

Any form of forced labor, i.e., work for which the person has not volunteered due to debt bondage or human trafficking, as well as slavery, slavery-like practices, servitude or other forms of oppression are prohibited. All work must be done freely and without threats of violence. Workers are not required to leave a "deposit" or their identification documents with their employer and are free to leave their employer after reasonable notice corresponding at least to the statutory notice periods.

## 2. No child labor

The use of child labor is prohibited. The supplier is required to comply with ILO Standards 138 on Minimum Age for Employment and 182 on Prohibition and Immediate Action to Eliminate the Worst Forms of Child Labor. If children are found at work, this should be documented, and action taken to find the cause and prevent future incidents.

## 3. Freedom of association and the right to collective bargaining

Workers, without exception, have the right to assemble and form a union of their choice and bargain collectively within the framework permitted by law. The supplier must adopt an attitude in line with legal requirements towards organizational and other activities of trade unions. Employee representatives are not discriminated against and have, within the legal framework, the opportunity to carry out their function in the workplace without hindrance. Where legislation restricts the right to organize and collective bargaining, the employer shall allow for the development of equal means for the establishment of independent and free representation for workers and shall not impede bargaining by workers in accordance with the law.

## 4. No discrimination

All areas of the company as well as all its decisions must be free from any form of direct or indirect discrimination. No one may be disadvantaged because of their age, gender, sexual orientation, pregnancy, disability, nationality, ethnic origin, skin color, religion or belief, political opinion, social background, or marital status, unless this is justified by the requirements of the job. Equal rights and equal treatment of seasonal workers, migrant workers and minorities must be ensured. Unequal treatment also includes the payment of unequal pay for work of equal value. The personal dignity, privacy and personal rights of each individual are respected.

Care must be taken to eliminate discrimination against women, to enable their meaningful participation in decision-making and managerial tasks, to ensure their professional development and advancement, and to give them equal access to and control over natural resources, utilities, means of production, advisory and financial services, training, markets, and information. All forms of gender identity are to be supported, and female, male, diverse or otherwise intersex people are to be treated equally.

## 5. Reasonable wages and working hours

The supplier is obliged to pay its employees at least the national statutory minimum wage or the standard minimum wage customary in the industry, whichever is higher. Moreover, the supplier strives to pay a living wage. The employees must also be granted all legally required benefits. The supplier must ensure that employees receive complete, easily understandable, and regular written information about the composition of their remuneration and that the remuneration is paid in a national currency. Wage deductions as a punitive measure are only permissible in the event of behavior in breach of contract within the framework of agreed contractual penalties.

The statutory working time regulations including overtime, breaks, rest, and vacation times as well as paid sick days and parental leave must be observed.

## 6. Fair recruitment and contracting

Recruitment services may only be obtained from officially licensed recruitment agencies. In accordance with the Employer Pays Principle, all fees for recruitment must be borne by the employer, provided they have been commissioned by the employer. The retention of employees' original personal documents is prohibited.

Employment contracts must be written in a language that employees are able to understand. They must contain precise information regarding wage levels as well as all additional fees and deductions unless these are specified by law or contract. Employment contracts must be signed by the employer and employee in order to be valid. The termination of the employment relationship in compliance with the contractually agreed notice period on the part of the employee must not be penalized with financial or any other type of sanctions, including blacklisting, for the employees or their families.

## 7. Health and safety at work

The supplier will provide a safe and healthy work environment. By setting up and applying appropriate occupational safety measures, the necessary precautions are taken against potential accidents, injuries and illnesses of employees caused by the related activities. The minimum requirements include the provision of drinking water, adequate sanitary facilities, personal protective equipment, adequate organization of working hours, as well as appropriate lighting, temperature control and ventilation. In addition, the employees are regularly informed about and trained in the applicable health and safety standards. Occupational health and safety regulations in the event of pregnancy and maternity protection guidelines must be complied with, taking into account national requirements. In addition, access to gender-sensitive health and safety measures must be ensured where legally required.

If accommodation is made available to employees, it must be clean, safe, and meet the people's basic needs.

## 8. Commitment to protecting the environment

The supplier is committed to avoiding or reducing waste and environmental pollution and strive to preserve natural resources.

## 9. Land use

The supplier is prohibited from violating applicable law in order to acquire or develop land, forests or bodies of water, the use of which secures the livelihood of people. Other harmful influences on the soil, water, or air that significantly impair the basis for the receipt and production of food are prohibited, as well as noise pollution, excessive water consumption, or prevention of access to clean drinking water and sanitation, which could damage peoples' health.

## 10. Implementation Provisions/Auditing

Employees or companies commissioned by Port International are entitled to check whether the supplier complies with the requirements. For this purpose, these representatives are entitled to visit the premises and company facilities of the supplier during business hours and to ask the supplier's employees about compliance with the code of conduct.